UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

ROBERT M. MILLER,

Plaintiff,

v.

Case No. 1:23-cv-195 (RDA/JFA)

MERRICK B. GARLAND, et al.,

Defendants.

DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME

Defendants, by and through undersigned counsel, hereby respectfully move this Court for an enlargement of time in which to file Defendants' opposition to Plaintiff's Application for a Preliminary Injunction (Dkt. No. 7-2). The grounds for this motion are set forth in the accompanying memorandum.

Dated: March 16, 2023

Respectfully submitted,

JESSICA D. ABER United States Attorney BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

/s/

BRIGHAM J. BOWEN Assistant Branch Director

KIRSTIN K. O'CONNOR

Assistant United States Attorney Office of the United States Attorney 2100 Jamieson Ave.

Alexandria, VA 22314 Tel: (703) 299-3799

Fax: (703) 299-3983 Email: kirstin.o'connor@usdoj.gov TAYLOR PITZ (CA Bar No. 332080) FAITH E. LOWRY (TX Bar No. 24099560) MICHAEL DREZNER (VA Bar No. 83836) JODY D. LOWENSTEIN

(MT Bar No. 5816869)

Trial Attorneys

U.S. Department of Justice

Civil Division, Federal Programs Branch

1100 L Street, N.W.

Washington, DC 20005 Phone: (202) 305-5200

Email: taylor.n.pitz@usdoj.gov

Counsel for Defendants